

**UNITED STATES DISTRICT COURT**  
 for the  
**Eastern District of Michigan**

United States of America

v

DENICO ADAMS

Case 2:20-mj-30081  
 Judge Unassigned,  
 Filed 02-14-2020  
 CMP SEALED MATTER (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief

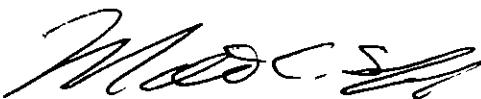
On or about the date(s) of May 30, 2018 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Wire Fraud
18 U.S.C. § 1028(a)	Aggravated Identity Theft

This criminal complaint is based on these facts

See attached affidavit

Continued on the attached sheet



Complainant's signature

Matthew C. Schuff, Special Agent, FBI  
Printed name and title



Judge's signature

Elizabeth A. Stafford, U.S. Magistrate Judge  
Printed name and title

Sworn to before me and signed in my presence

**FEB 14 2020**

Date                   

City and state Detroit, MI

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, **Matthew C. Schuff**, being first duly sworn, hereby depose and say

1 I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the FBI Oakland County Resident Agency, Detroit Metro Identity Theft and Financial Crimes Task Force (DMIFT) I have been employed with the FBI since 2003 and a Special Agent for over ten years. Affiant has been trained in the investigation of all types of crimes, with specific emphasis on white collar crimes to include bank fraud, wire fraud, and identity theft violations.

2 This affidavit is based upon information I have gained from my investigation, my training and experience and from information provided by law enforcement officers and others who have personal knowledge of the events and circumstances described herein.

3 The information set forth in this affidavit is in support of a criminal complaint and arrest warrant and is for the limited purpose of establishing probable cause, this affidavit, therefore, may not include all the information collected during this investigation.

**DETAILS OF THE INVESTIGATION**

4 The FBI DMIFT Task Force is tasked with the investigation of large groups engaged in significant identity theft operations in and around the Detroit Metropolitan area. Information obtained on these actors comes from various

sources to include (but not limited to) banks and credit card companies, private retailers where fraudulent information is used, individual victims, and through information sharing with other members of law enforcement

5 Through review of information received from retailers and cellular phone companies, as well as through visual identification and other means, your affiant has identified DENICO ADAMS as having been involved in fraudulent use of cellular phone accounts (such as AT&T Accounts) and aggravated identity theft in the Eastern District of Michigan

6 DENICO ADAMS's involvement in identity theft was brought to the attention of your affiant during a prior investigation ADAMS is currently under indictment in the Eastern District of Michigan (18-CR-20641) for Conspiracy to Commit Wire Fraud, Conspiracy to Commit Money Laundering, and Aggravated Identity Theft, all arising from the use of cloned credit cards, primarily at Walmart stores

7 During the course of the previous investigation, AT&T provided information to your Affiant that DENICO ADAMS, and others, were also involved in identity theft targeting AT&T cellular accounts According to AT&T, several schemes were identified to include wireless subscription fraud, "add-on" fraud, and handset upgrade fraud

8 According to AT&T, wireless upgrade fraud occurs when someone obtains cell phone equipment or services using stolen or fictitious customer information

“Add-on” fraud occurs when someone steals a cell phone customer’s personal information, uses it to impersonate the customer, adds a new phone number subscription to an existing account, and has charges for new service and/or equipment applied to the victim customer account In some cases, “add-on” fraud can be done in person at a retail store to obtain cell phone handsets that can be billed to victim accounts

9 Handset upgrade fraud, per AT&T, occurs when someone steals a cell phone customer’s personal information, uses it to impersonate the customer, buys a new phone handset, and has charges for the new handset applied to the victim customer account This is most commonly done by adding an “authorized user” name to an existing account Someone else then presents a photo ID in the name of the new, fraudulently-authorized user at a cell phone store

10 In 2018, AT&T presented a report to your affiant that stated over 100 AT&T cell phone accounts associated with the defendants of 18-cr-20641, to include DENICO ADAMS, were canceled by AT&T for identity theft AT&T contacted some of the true customers whose personal information was used to activate the accounts These customers stated they did not authorize the use of their personal information to activate the accounts After these accounts were activated, individuals purchased high-end cell phone handsets on installment at various retail locations across the United States and had the charges for these devices billed to the fraudulent

accounts. Most of the accounts had the billing names and addresses changed shortly after activation. Additionally, in some cases the accounts were activated using the names, social security numbers, and addresses of identity theft victims. The billing names were later changed to the name of the suspects, without the knowledge or consent of the victims.

11 Specifically, between July 2017 and June 2018, through the analysis of their records, AT&T determined DENICO ADAMS was associated with handset upgrades where the user name of DENICO ADAMS was added on 11 accounts fraudulently, and 43 occasions where the billing name was changed to DENICO ADAMS.

12 Additionally, at least one of the above frauds occurred within the Eastern District of Michigan at a Walmart store in Novi, Michigan. According to AT&T records, on or about May 30, 2018, a handset upgrade transaction occurred on an AT&T account in the name of an individual identified herein as Victim-1. Records reflected a Samsung Galaxy S9 cell phone was acquired that day within the Walmart store and a user name of DENICO ADAMS was added to the AT&T account of Victim-1, with an address in Westland, MI.

13 Your affiant contacted Walmart corporate security and obtained a receipt and video surveillance of the above transaction. The Walmart receipt confirmed the purchase of a Samsung S9, for a total of \$709 before tax. A review of surveillance

video and photos associated with the purchase revealed a male customer at the cash register during the transaction Video surveillance further depicts the customer leaving the store with a bag, after the purchase

14 Your affiant has reviewed numerous surveillance images and identification photos of DENICO ADAMS during the course of both this investigation and the prior investigation Upon review of the Walmart surveillance footage, your affiant believes the male making the purchase on Victim-1's account was DENICO ADAMS

15 Shortly after the above transaction, AT&T closed the Victim-1 account for fraud Additionally, on or about January 27, 2020, your affiant spoke with an investigator from AT&T who advised she identified Victim-1 as a woman located in Texas, who was in her mid-70's, and who suffered from dementia AT&T further stated DENICO ADAMS' information was "all over the account" of Victim-1, which included additional unauthorized transactions at other AT&T retailers Addresses on the Victim-1 account included addresses in the Detroit Metro area that were also associated with DENICO ADAMS

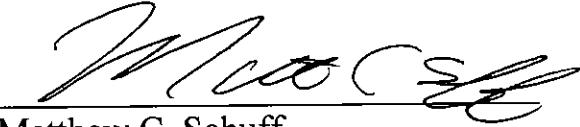
16 On or about January 29, 2020, your Affiant spoke with the husband of Victim-1, who advised his wife was in poor health Victim-1's spouse confirmed neither he nor his wife were aware of the above cellular phone transaction at the time and never authorized DENICO ADAMS nor anyone else to obtain a cellular phone

or any other account in their names Victim-1's spouse further stated they had never been to Michigan and were unfamiliar with the name DENICO ADAMS

17 During the course of the fraudulent transaction at the Walmart in Novi, MI, there is probable cause to believe DENICO ADAMS caused information to be transmitted by means of a wire, in furtherance of interstate commerce, i.e., certain signals and wire communications between the point of sale terminal in Michigan and Walmart and AT&T servers located in other states

18 Likewise, during and in relation to above-described wire fraud, there is probable cause to believe DENICO ADAMS, without lawful authority, knowingly transferred, possessed, and used a mean of identification of another person, i.e personally identifiable information associated with Victim-1

19 Based on the above, I believe probable cause exists that DENICO ADAMS committed violations of 18 U.S.C. 1343 (Wire Fraud) and 18 U.S.C. 1028(a) (Aggravated Identity Theft), in the Eastern District of Michigan



Matthew C. Schuff  
Special Agent  
Federal Bureau of Investigation

Subscribed to and sworn before me  
This 14<sup>th</sup> day of February, 2020



Elizabeth A. Stafford  
United States Magistrate Judge